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Attorneys for MOAC Mall Holdings LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
)	Case No. 18-23538 (RDD)
)	
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,)	(Jointly Administered)
)	
Debtors. ¹)	

**CERTIFICATE OF NO OBJECTION TO MOTION OF MOAC MALL HOLDINGS LLC
FOR LEAVE TO FILE UNDER SEAL ITS DECLARATION OF LOUIS W. FRILLMAN
IN OPPOSITION TO THE PROPOSED ASSUMPTION AND ASSIGNMENT
OF THE MOAC LEASE**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

TO THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York, the undersigned hereby certify as follows:

1. On October 15, 2018 and continuing thereafter, each of Sears Holdings Corporation and its debtor affiliates, as debtors and debtors-in-possession (the “Debtors”), voluntarily filed for bankruptcy relief under Chapter 11 of Title 11 for the United States Code.

2. On August 16, 2019, MOAC Mall Holdings LLC (“MOAC”) conferred with counsel for Debtors and Transform Holdco LLC regarding its intent to file its *Motion of MOAC Mall Holdings LLC for Leave to File under Seal Its Declaration of Louis W. Frillman in Opposition to the Proposed Assumption and Assignment of the MOAC Lease* (the “Seal Motion”) and received from said counsel their verification of no objection.

3. Accordingly, MOAC respectfully requests that the proposed order filed as Exhibit A to the Seal Motion and emailed in Word format to the Chambers of the Honorable Robert D. Drain be entered in accordance with the *Amended Order Implementing Certain Notice and Case Management Procedures* filed as ECF No. 405.

[Signature page to follow.]

The undersigned declare that the foregoing is true and correct.

Dated: August 18, 2019

Respectfully submitted,

/e/ Thomas J. Flynn

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Admitted *pro hac vice* on December 26, 2018

Dated: August 18, 2019

/e/ David W. Dykhouse

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